

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor.

PROMESA

Title III

No. 17 BK 3283-LTS

**MOTION TO INFORM SUBMISSION OF DOCUMENTS:  
EXHIBITS TO:**

**MOTION TO DETERMINE THE APPLICABILITY OF THE AUTOMATIC STAY  
AND/OR FOR RELIEF FROM THE AUTOMATIC STAY**

Now comes Corporación Marcaribe Investment (hereinafter “Marcaribe”), a Creditor and a Chapter 7 Debtor in the District of Massachusetts, through Counsel, and with the assent of the Chapter 7 Trustee, John Desmond, Esq., and respectfully motions to submit documents (Exhibits A-B as attached to this Motion) to its Motion for Relief Under 362 (Docket #4493)

WHEREFORE, it respectfully prayed that Creditor, Marcaribe, be this motion and for any other relief deemed necessary and proper

Through Counsel for Marcaribe, Debtor’s Attorney in Chapter 7 Bankruptcy in the District of Massachusetts With the Assent of Attorney Kate Nicholson,Counsel of the

Chapter 7 Trustee, John Desmond /s/ Carmenelisa Perez-Kudzma

U.S. District of Puerto Rico #305612

Perez-Kudzma Law Office, P.C

Arecibo #349, Urb. La Cumbre, San Juan, PR 00926

35 Main Street, Suite 1 Wayland, MA 01778

T: (781) 209-5596

F: (978-600-1482

[carmenelisa@pklolaw.com](mailto:carmenelisa@pklolaw.com)

Dated: December 18, 2018

The filing of this Motion has been assented to by:

Counsel for John Desmond  
Chapter 7 Trustee

/s/ Kate E. Nicholson  
Nicholson Herrick LLP  
21 Bishop Allen Dr.  
Cambridge, MA 02139  
857.600.0508 (voice or text)  
617.812.0405 (facsimile)  
[www.nicholsonherrick.com](http://www.nicholsonherrick.com)

Dated: December 19, 2018

### **Certification**

In compliance with Paragraph III.Q of the Seventh Amended Case Management Procedures order (ECF No. 4086-1), we certify that on we sent to counsel for the Oversight Board and AAFAF a notice advising them of MARCARIBE's intention to seek relief from the Title III automatic stay. After emailing the notices on November 27, 2018 at 9:36AM, counsel for MARCARIBE received a reply from Attorney Claudia A. Juan Garcia acknowledging receipt of the Notice on November 27, 2018 at 1:07 PM. No other replies were received. So no agreement was reached to lift or modify the stay with respect to MARCARIBE's request for lifting the stay since Counsel for Acevedo received no more communications.

### **Service**

A. All Documents shall be served, in the manner described herein, on the following parties

i) United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Suite No. 3212  
New York, New York 10007-1312

ii) Office of the United States Trustee for Region 21  
Edificio Ochoa, 500 Tanca Street, Suite 301  
San Juan, PR 00901-1922

(iii) Puerto Rico Fiscal Agency and Financial Advisory Authority (AAFAF):  
Puerto Rico Fiscal Agency and Financial Advisory Authority  
Roberto Sánchez Vilella (Minillas) Government Center  
De Diego Ave. Stop 22  
San Juan, Puerto Rico 00907  
Attn: Gerardo J. Portela Franco

Mohammad Yassin, Esq.  
E-Mail: Gerardo.Portela@aafaf.pr.gov  
Mohammad.Yassin@aafaf.pr.gov

(iv) Counsel for AAFAF:  
O'Melveny & Myers LLP  
7 Times Square  
New York, New York 10036  
Attn: John J. Rapisardi, Esq.  
Suzanne Uhland, Esq.  
Peter Friedman, Esq.  
Diana M. Perez, Esq.  
E-Mail: jrapisardi@omm.com  
suhland@omm.com  
pfriedman@omm.com  
dperez@omm.com

Law Offices of Andrés W. López, Esq.  
902 Fernández Juncos Ave.  
San Juan, PR 00907  
Attn: Andrés W. López, Esq.  
E-Mail: andres@awllaw.com

(v) Counsel for AAFAF (PREPA):  
Greenberg Traurig LLP  
MetLife Building  
200 Park Avenue  
Cancio, Nadal, Rivera & Díaz, P.S.C.  
PO Box 364966  
San Juan, PR 00936-4966